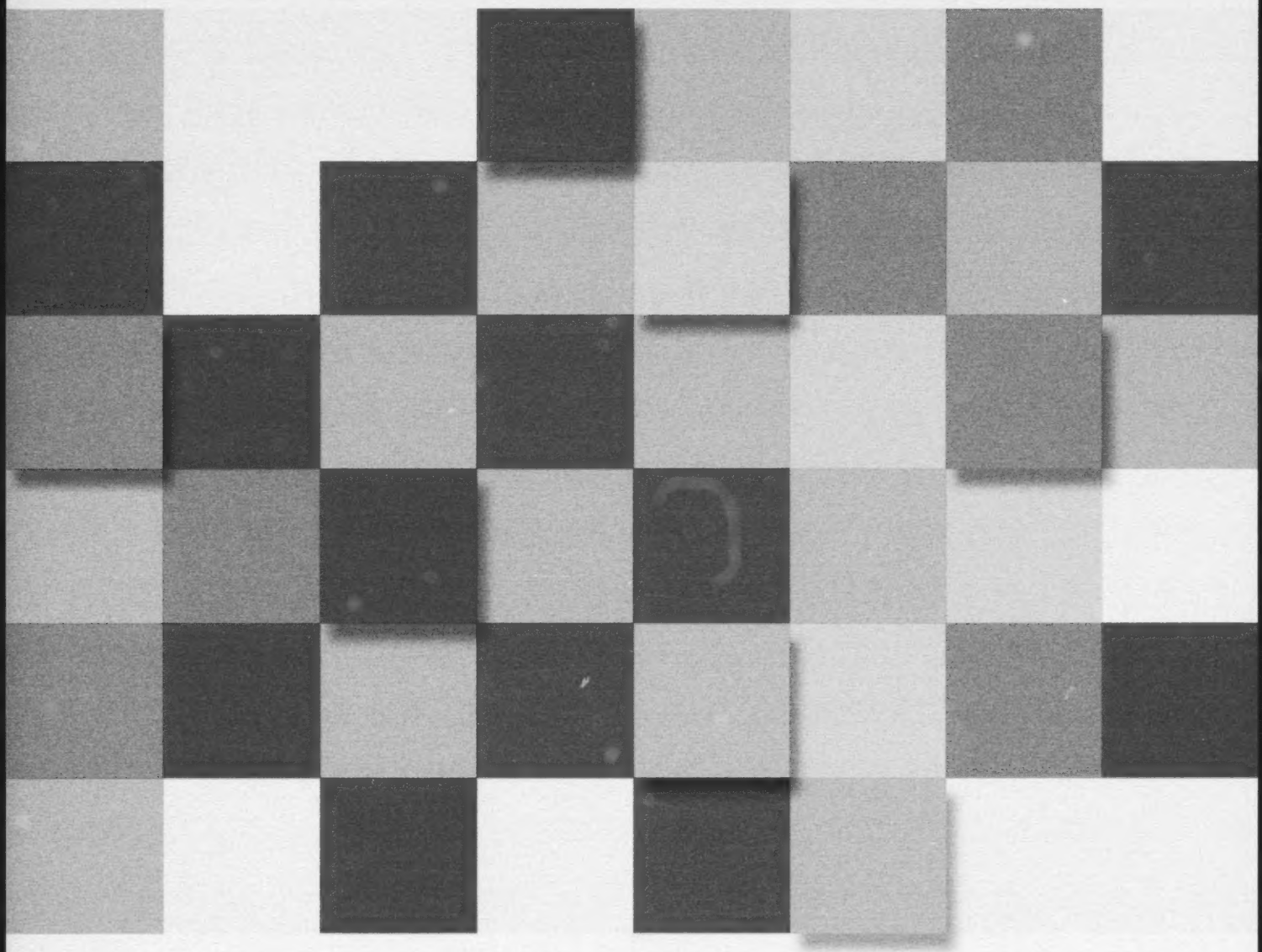
Office of The Integrity Commissioner of Ontario



ENCOURAGING A CULTURE *of* INTEGRITY

Annual Report 2015-2016

Legislative Assembly of Ontario

Assemblée législative de l'Ontario

Office of the Integrity Commissioner
J. David Wake, Commissioner

Bureau du commissaire à l'intégrité
J. David Wake, Commissaire

June 2016

The Honourable Dave Levac

Speaker of the Legislative Assembly of Ontario

Dear Mr. Speaker,

It is an honour to present the Annual Report of the Office of the Integrity Commissioner for the period April 1, 2015, to March 31, 2016.

Sincerely,

The Honourable J. David Wake

Integrity Commissioner

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Commissioner's Message

This is my first annual report, having been appointed the fifth Integrity Commissioner of Ontario effective February 1, 2016. Most of the activities covered by this annual report occurred during the term of my predecessor, Lynn Morrison, who retired on December 31, 2015, after 35 years in public service, the last 8.5 of which were spent as Integrity Commissioner.

Commissioner Morrison will always have a special and unique place in the history of the Office of the Integrity Commissioner. She had been with the Office since its inception in 1988 when she served as Executive Assistant to the first Commissioner, The Honourable Gregory T. Evans. The Office then had only one mandate, under the *Members' Conflict of Interest Act, 1988*, a predecessor to the *Members' Integrity Act, 1994*. It was the first provincial legislation of its kind in Canada. Over the years, the Office has seen a gradual increase in its jurisdiction to the point where it now has six mandates operating under five pieces of legislation. Commissioner Morrison was active in making recommendations to improve each statute as it was introduced, or subsequently as part of a careful review of the legislation. Most recently, she had oversight of significant amendments to the *Members' Integrity Act, 1994*, the *Lobbyists Registration Act, 1998* and the *Public Sector Expenses Review Act, 2009*.

The Honourable J. David Wake
Integrity Commissioner

With the added jurisdiction of the Office and the increase in the volume and complexity of matters which were coming to it, Commissioner Morrison secured an enduring legacy by persuading the Board of Internal Economy to increase the size of the Office's staff in order to meet its responsibilities.

In the brief period since I began my term I have been very impressed by the people employed in the Office and their dedication to achieving its goals. They are keenly aware of the importance of the work that is done at the Office to encourage and ensure public confidence in government. While Commissioner Morrison's corporate memory will certainly be missed, she has left the Office in excellent shape to assist me in meeting the challenges ahead, and for that I am personally very grateful to her.

Mandates

Ministers' Staff

Public Service of Ontario Act, 2006

One of the successful initiatives undertaken by Commissioner Morrison in 2014 was a consultation with current and former MPPs, premiers, public servants and ministers' staff to understand the role of ministers' staff and to determine how to provide them, as their Ethics Executive, with the best possible advice. Her report made several recommendations, including the provision of formal training for ministers' staff with respect to their ethical obligations. I am pleased to report that this recommendation was accepted and has become mandatory. All new ministers' staff attend training sessions conducted by Office staff. In addition to these regular training sessions, there is a steady stream of people coming to the Office for post-employment meetings to review their obligations and restrictions after they have left the public service. It would, however, be helpful if all staff could be reminded that they should contact the Office *before* they start their new employment search.

Lobbyists Registry

Lobbyists Registration Act, 1998

Significant amendments have been made to the *Lobbyists Registration Act, 1998*, which, when proclaimed, will result in substantial changes to the registry. Not only will the registration process

be updated with the addition of new questions, but the threshold for registration by in-house lobbyists will be reduced. Most importantly, the Integrity Commissioner as Lobbyists Registrar will have the authority to investigate complaints either received from members of the public or on the Commissioner's own initiative, and can issue penalties including prohibition from lobbying for up to two years. I trust that I will only have to use this power sparingly. My focus is on promoting compliance with the Act without having to rely on investigations and penalties. To that end, my Office has prepared a full communications plan and registry system rollout that will be ready to go as soon as proclamation has taken place.

Expenses Review

Public Sector Expenses Review Act, 2009

The Office has also been working to fulfill the requirements brought by significant amendments to legislation with respect to the review of travel, meal and hospitality expenses incurred by public entities. Since 2010, the Office has reviewed the expenses of a limited number of Ontario's largest public bodies. The amendments to the Act, which were proclaimed on November 1, 2015, increased the pool of entities eligible for review from 19 to approximately 180. It is intended that as an entity demonstrates consistent compliance it will be replaced, subject to recall, by another agency. The first entity from the expanded pool of entities has been selected, notified and been in contact with the Office in preparation for submission of its expenses.

The Office has six mandates operating under five pieces of legislation

Cabinet Ministers' and Opposition Leaders' Expenses Review and Accountability Act, 2002

In the short time I have been Commissioner I have approved hundreds of these expenses after thorough review by the Office staff. Overall, I have been impressed by the high degree of compliance and I am pleased with the diligence shown by the persons subject to this Act, namely, cabinet ministers, opposition leaders, parliamentary assistants and their respective staff, in managing their expense claims.

Disclosure of Wrongdoing

Public Service of Ontario Act, 2006

This is the eighth full year of operation under the disclosure of wrongdoing framework. Disclosures can be made by current and former public servants internally to their Ethics Executive, or to the Office. The number of disclosures made internally is startlingly low, far fewer than those disclosed to the Office. It was always Commissioner Morrison's view that the Office should be one of last resort, and yet the numbers do not bear this out. It seems that either the process for gathering statistical information on internal reports is flawed or there is a lack of awareness within the public service of the avenue available to potential disclosers within their own ministry or public body to raise issues about misconduct they witness at work. Perhaps it is a combination of both.

Recently I was invited to speak at a seminar organized by the Conflict of Interest Commissioner, Sidney B. Linden, to approximately 50 Ethics Executives from public bodies. I reviewed the options available for making a disclosure and emphasized the requirement in the Act for Ethics Executives to ensure that public servants in their respective ministries or public bodies are familiar with the process for filing a disclosure of wrongdoing. I acknowledged that disclosers, or whistle-blowers as they are more commonly known, are sometimes regarded as malcontents or troublemakers. This cannot be an acceptable reaction to the receipt of a disclosure of wrongdoing from a public servant who has summoned the courage to come forward with a disclosure. I reminded everyone of what Justice France Charbonneau said in her recently concluded report into corruption in the construction industry in Quebec. She suggested that "whistle-blowing must not be seen as an act of betrayal, but as an act of loyalty to society."

Members' Integrity

Members' Integrity Act, 1994

It can be seen that the number of mandates for the Office of the Integrity Commissioner has increased significantly over the years; however, the foundational mandate for this Office has always been members' integrity. In the weeks since I became Commissioner I have enjoyed reading all previous annual reports in preparation for my duties. In the very first report I noted that then–Attorney General Ian Scott was quoted from his statement introducing the bill which led to the passing of the *Members' Conflict of Interest Act, 1988* (the predecessor legislation to the *Members' Integrity Act, 1994)* which created this Office. Mr. Scott outlined the underlying purpose for the legislation as follows:

> *The fundamental premise is that members are committed to serving the public interest. The aim of legislation on this subject is primarily to set standards by which members can measure their conduct (and be measured) and from which they can gain assurance that compliance will protect their integrity. From this perspective, the intent of the law is facilitative; that is, to assist members in the performance of their duties and obligations.*

Although the names of the legislation and the Office have changed, the fundamental premise stated by the Attorney General has not.

One of my responsibilities under the Act is to receive inquiries and offer confidential advice on ethical issues raised by MPPs. Since my arrival I have found that it is rare for a day to go by without at least one inquiry being received. Some of these queries can be complex. It would be an easy matter simply to advise that a course of action be avoided in all cases, but that would ignore the political reality of the world in which MPPs live and their natural desire to assist constituents whenever possible. I take the view that advice suggesting a course of action be avoided, or is prohibited, should be given only after all other options have been considered.

Although the Office can rely on its many years of experience in fielding these queries, the discipline of ethics is not a static one. Attitudes and opinions on an issue can change over time and some issues are relatively recent, such as the appropriate use of social media.

I look forward to meeting each MPP this fall as part of the annual review of their respective private disclosure statements as required by the Act, as well as to continue a dialogue on the ethical matters with which they are faced.

Under section 30 of the Act, inquiries can be conducted when one MPP files a complaint about another MPP. Commissioner Morrison issued two section 30 reports this year. A third complaint has recently been filed and is at the preliminary stage. The details of the two reports completed this year can be found in the MPP Integrity section of this report.

Education and outreach have been an important facet of the Office's operations through the years. It is my intention to continue this work as I meet with the many different stakeholders of the Office.

Members' Integrity

ADVISING MPPS ON CONFLICT OF INTEREST AND ETHICAL BEHAVIOUR

MPP Integrity

Mandate

Under the *Members' Integrity Act, 1994*, the Integrity Commissioner is responsible for:

- receiving inquiries and offering advice on ethical issues raised by MPPs;
- overseeing each MPP's annual private and public disclosure statements; and
- conducting inquiries into alleged violations of the Act when raised by one MPP about another.

Overview

The Office is a key resource for MPPs and their staff, providing confidential advice regarding ethical issues that arise in the performance of an MPP's duties of office. This year, the Office received 309 inquiries from members and their staff regarding the obligations of MPPs under the Act. MPPs sought the Commissioner's advice on a variety of matters, including accepting tickets to events, assisting charities and non-profit entities, providing letters of support and the proper use of government resources.

This year, the Office received 309 inquiries from members and staff

This year members filed their annual private disclosure statements using a new online system which allowed the Office to streamline the review process and publication of MPP statements on the Office website. The Commissioner met with all MPPs to discuss their responsibilities and obligations under the Act and took the opportunity to provide additional information about the disclosure of gifts to the Office and the importance of obtaining the written advice of the Commissioner. MPPs were also briefed on the amendments to the *Lobbyists Registration Act, 1998*, which will require lobbyists to identify MPPs they are lobbying by riding name.

Commissioner's Reports

Use of Constituency Office Resources

The Commissioner received a complaint from MPP Yvan Baker (Etobicoke Centre) about MPP Jagmeet Singh (Bramalea–Gore–Malton). The Commissioner was asked to investigate whether Mr. Singh breached the Act in relation to the use of his constituency office and his website.

In June 2015, the Office released a report in which the Commissioner found that constituency resources had been used in connection with a partisan activity. The Commissioner also found that although Mr. Singh did not intend to have a constituency website, information provided on his personal/partisan website was such that a reasonably informed constituent would believe that it was his virtual constituency office. For this reason, the Commissioner found that Ontario parliamentary convention had been breached.

The Commissioner did not recommend that a penalty be imposed, but did recommend that Mr. Singh ensure that his staff receive training about the appropriate use of legislative resources and that he review his website to ensure that constituents do not mistake it for his virtual constituency office.

Use of Government Resources for Partisan Purposes

The Commissioner received a complaint from MPP Michael Harris (Kitchener–Conestoga) about MPP Daiene Vernile (Kitchener–Centre) and MPP Jeff Leal (Peterborough). The Commissioner was asked to investigate whether Ms. Vernile and Mr. Leal used government resources for partisan purposes in relation to the federal election campaign.

In December 2015, the Office released a report in which the Commissioner found that neither member promoted the candidate as alleged and did not breach Ontario parliamentary convention. The Commissioner urged MPPs to "think before they link".

Although not the subject of the complaint, the Commissioner's investigation also revealed inappropriate use of constituency websites by a number of MPPs. Most MPPs have taken steps to ensure that the content available directly on their websites is non-partisan. The Commissioner was disappointed to note that MPPs have been less diligent about ensuring that content accessible through links on their constituency websites, particularly to social media, is similarly non-partisan. The Commissioner recommends that all MPPs with social media accounts linked to their constituency websites cease posting partisan messages and warned that future non-compliance may result in penalties being recommended.

The Office is available to provide specific advice and guidance to members and their staff about how to have an appropriate online presence where their constituents can access their provincial representatives in a partisan-free environment.

The Office is available to provide specific advice and guidance to members and their staff

Political Party Fundraising

The Commissioner received a complaint from MPP Marie-France Lalonde (Ottawa–Orléans) about MPP Patrick Brown (Simcoe North). The Commissioner was asked to investigate whether Mr. Brown breached the Act in relation to political party fundraising. The matter was under review at fiscal year-end, and a report will be available on the Office's website.

Inquiries

The following are samples of the inquiries received by the Commissioner this year. These summaries are published to help MPPs and their staff identify circumstances that could give rise to issues under the Act. The inquiries and the opinions are abbreviated, and the identities of those involved are anonymized and alternate in gender. The cases are provided in order to raise awareness. It is important to remember that each opinion is based on its own set of disclosed facts and should not be considered a substitute for calling or writing the Office.

Gifts and Benefits

Tickets Offered by a Lobbyist

An MPP was offered tickets to a dinner and reception hosted by a government stakeholder and registered lobby group that fell within the member's critic portfolio. The member interacted frequently with this stakeholder in his capacity as critic. Could the member accept the tickets?

Opinion

The Commissioner advised that the member not accept the tickets. The Commissioner did not consider the tickets to be offered on account of the customs, protocol or social obligations that normally accompany an MPP's responsibilities of office, and none of the other exceptions found in section 6 applied. The Commissioner advised that the Act prohibited the member from accepting the tickets.

Tickets Offered by Local Company

An MPP was offered tickets to a dinner and reception hosted by a government stakeholder which was a prominent industry in the member's riding. Could the member accept the tickets?

Opinion

Nothing in the Act prohibited the member from accepting the tickets. However, the Commissioner advised the member to be careful not to put herself in a position where anyone, especially a government stakeholder, may come to expect preferential treatment from the member now or in the future. The Commissioner also cautioned the member to be careful not to set up any expectation that she would do something in return for the tickets.

If the member accepted the tickets, she was advised to file a gift disclosure form with the Office within 30 days of accepting the tickets.

Invitation to an Information Event

An MPP was invited to attend an event hosted by a prominent government stakeholder and lobby group about regulatory reform within the member's critic portfolio. The event was not a dinner or reception. Could the member attend?

Opinion

The Commissioner reminded the member that lobbying is a legitimate activity; since he was not accepting a gift from the lobbyist, such as a dinner, it would be appropriate for the member to attend. The Commissioner reminded the member to avoid situations where anyone may come to expect unique or preferential treatment.

Admission to a Conference

An MPP was offered free admission to a conference by a non-profit group. Neither the non-profit, nor the conference, was located in the member's riding. The member was unable to attend, and asked the Commissioner if she could first accept the tickets, and in turn give them to a constituent of the member's choosing.

The Commissioner reminded the member to avoid situations where anyone may come to expect unique or preferential treatment

Opinion

The Commissioner first considered whether the member should accept the conference tickets, which would be considered a gift or benefit under the Act. The tickets had been offered on account of the member's status as MPP, which prohibited her from accepting them unless an exception to the rule applied. The Commissioner found that none of the exceptions applied, and the member was prohibited by the Act from accepting the tickets. The Commissioner further advised that despite the fact that the member was not ultimately the one using the tickets, she would still be accepting the gift and it was this acceptance that the Act did not allow.

Receiving a Gift Card as a Thank-You Gift

An MPP gave a speech to a community group and received a $75 gift card as a thank-you gift. Could he keep the gift card?

Opinion

The narrow exception to the gift rule for gifts or benefits given on account of "customs, protocol or social obligation" is meant to encompass token gifts of thanks related to activities that are a normal part of the member's responsibilities as a provincial representative, such as a pen or a coffee mug to commemorate the speech. The Commissioner advised that the gift card should be returned.

Tickets to a Festival Outside an MPP's Riding

An MPP was offered tickets of her choice to a popular festival. The festival extended the invitation because of the member's position in government. The festival receives provincial funding and does not take place in the member's riding. Could she accept the tickets?

Opinion

The Commissioner advised that the member not accept the tickets because they were not an exception to the blanket prohibition on receiving gifts. The only reason the festival tickets had been offered was because the member was a government representative. The festival tickets for this particular member were unrelated to the customs, protocol or social obligations that normally accompanied her responsibilities of office. Despite the member's varied responsibilities of office, none of these responsibilities required her to attend the festival as a guest of the festival itself.

Stakeholder Offers to Supply Cooks for Barbeque

A large national company and government stakeholder, which is registered to lobby all MPPs and several ministries, offered to have some of its employees cook food at a minister's annual constituency barbecue. The minister purchased the food from his constituency office's global budget. Did the Commissioner consider this appropriate?

Opinion

The Commissioner advised that the minister not accept the company's offer. While employees cooking food does not necessarily constitute advertising, companies attend public events in order to promote the company's interests. Accepting the company's offer could lead to the perception that the minister and the company have similar or allied interests, which should be avoided. Constituency events are paid for from public money and should be free of private entities promoting themselves.

Representation of constituents

Request to Help Group Fundra

A non-profit group asked an MPP to attend a community event in the member's constituency and to help the group fundraise. The group asked the member to provide information, recruit new donors and answer questions about the non-profit at the event. What did the Commissioner advise?

Opinion

The Commissioner recommended that the member avoid participating in this event. The Commissioner did not consider this activity to be part of the MPP's responsibilities of office. In addition, care must be taken that the member is not seen to be favouring one organization over another.

Commissioning a Ministry Form

An MPP does not want to commission a ministry form for a constituent. Was this a breach of the Act?

Opinion

There is nothing in the Act that requires a member to commission a document, nor is there anything in the Act that prevents a member from doing so. The Commissioner advised that it was the member's choice.

Request to Forward a Resumé

A constituent asked an MPP to forward a resumé to a municipality in the member's constituency on behalf of the constituent's child. The constituent did not specify a particular job competition, and was not asking the member to act as a job reference. Was this appropriate?

Opinion

The Commissioner advised that the member not forward the resumé. While not asking directly, the constituent was asking for the member to use her office to "wave the magic wand" to achieve a particular outcome, which would be contrary to the Act.

Providing a Service Review for a Vendor

An MPP used a vendor's services for a constituency event and paid the vendor from the constituency office budget. The vendor asked the member to give a service review to be used on the vendor's website for promotional purposes. The member was satisfied with the services of the vendor and wanted to provide the review. Was this appropriate?

Opinion

The Commissioner advised the member not to provide the review. As a public office holder, the member could face criticism for using his office to assist a private entity with advertising or a positive review. Additionally, the member would not be able to maintain control over the review, such as where it appeared and how, given that it was proposed for use on the vendor's website.

Request for Certificate of Congratulations

A constituent requested that a minister issue her a congratulatory certificate for attaining membership in a professional regulatory body. Could the certificate be provided?

Opinion

The Commissioner advised against issuing the certificate for two reasons. First, the Commissioner was concerned that the constituent would use the congratulatory certificate for profit, such as to promote her business. Second, the Commissioner expressed general concern about the inability of the member to control the use of the certificate. These considerations were of heightened importance given the member's role as a cabinet minister.

Request to Send a Thank-You Note to a Hospital Department

A minister was asked by a constituent to send a thank-you note on the constituent's behalf to a hospital department from which the constituent was still receiving treatment. What was the Commissioner's advice?

Opinion

The Commissioner advised against sending the note. The constituent did not require the assistance of an MPP to complete this task; rather, it was something he could undertake himself. Furthermore, the fact that the constituent was still undergoing treatment in the hospital could give rise to the perception that the minister was using her influence as a public official in order to improperly further someone's private interest, which is contrary to the Act.

Appropriate Content for Website

A minister is often asked to make announcements related to his cabinet portfolio at events in the constituency. Could these events be highlighted on the constituency office website?

Opinion

The Commissioner advised that constituency office resources should not be used to inform the public about a minister's activities as a minister. Constituency office resources can include the salaried time of constituency staff and constituency office premises, telephones and computers. As such, it would be best not to include mention of the minister's status as a member of cabinet on the constituency office website.

It is also important that communications about non-constituency–related events not be included in the communications materials that MPPs send out using their constituency budgets and resources. Rather, only articles and communications pieces about MPP-related activities should be included on the constituency website. As the minister's constituency website is funded with legislative resources, it should not promote private interests, including those of any political party. The newsletter should also avoid referencing particular political parties.

The Commissioner further advised the minister and his staff to contact the Office for advice about specific events as they arise, so that the Commissioner can provide the minister with the best advice tailored to each specific situation.

Request to Obtain Information from a Physician

A constituent was having difficulty accessing a ministry prescription drug program and asked her MPP to assist. To gain access to the program, a supporting professional opinion was required from the constituent's treating physician. The physician's opinion was that the constituent should not have access to the program. The constituent asked the member to write a letter to the physician to request an explanation as to why the physician would not support the application. Could the letter be provided?

Opinion

The Commissioner advised the member not to write the letter to the physician. Section 4 of the Act prohibits members from using their office to seek to influence another person in order to advance a private interest. It was likely that contacting a physician in such a case could be interpreted as an attempt to influence that judgment for the benefit of the constituent. The Commissioner emphasized that MPPs must respect established policies and procedures, including this particular application process's requirements, and must not appear to try to circumvent this process by even indirectly exerting pressure on the physician.

Outside Activities

Joining a Charity

A minister was asked to accept a position as a committee member for a charity in her constituency. It was likely that the minister would be expected to participate in fundraising as a committee member. The charity's main objective was to obtain provincial funding. Could the member accept the position?

Opinion

While the Commissioner commended the minister's efforts to assist organizations in the community, the minister was advised not to accept the position. Because the charity was seeking provincial government funding, even belonging to a fundraising committee could be interpreted as using improper influence as a minister, contrary to the Act.

Constituency Office Staff — Other Employment

A constituency office staff member asked if there were general restrictions on staff who participate in activities outside of their employment, including activities that may discuss or criticize Ontario government policies.

Opinion

While the Commissioner does not have specific jurisdiction over constituency office staff, the Commissioner often provides advice to staff members, since the actions of staff can reflect on the MPP. The Commissioner offered the following advice:

- the member should be made aware and should approve of all outside activities of staff, whether the staff member is part-time, full-time or on contract;
- staff members should not identify themselves as employees of an MPP while participating in outside activities, in order to avoid the perception that they are using their position to influence an outside organization, process or activity;
- staff should not become involved in any activity that could potentially conflict with their work in the member's office. If the member or a member of staff has any concerns in this regard, the Commissioner recommends contacting the Office for guidance; and
- MPPs and their staff should never use legislative resources to participate in outside activities. These resources can include the salaried time of staff, legislative computers, telephones, email accounts and constituency office premises.

The Commissioner recommended that staff continue to communicate regularly with the member about their outside activities. The Commissioner also recommended that the member or their staff seek the Commissioner's advice if there are concerns about how a particular outside activity or a staff member may have an impact on the member's obligations under the Act.

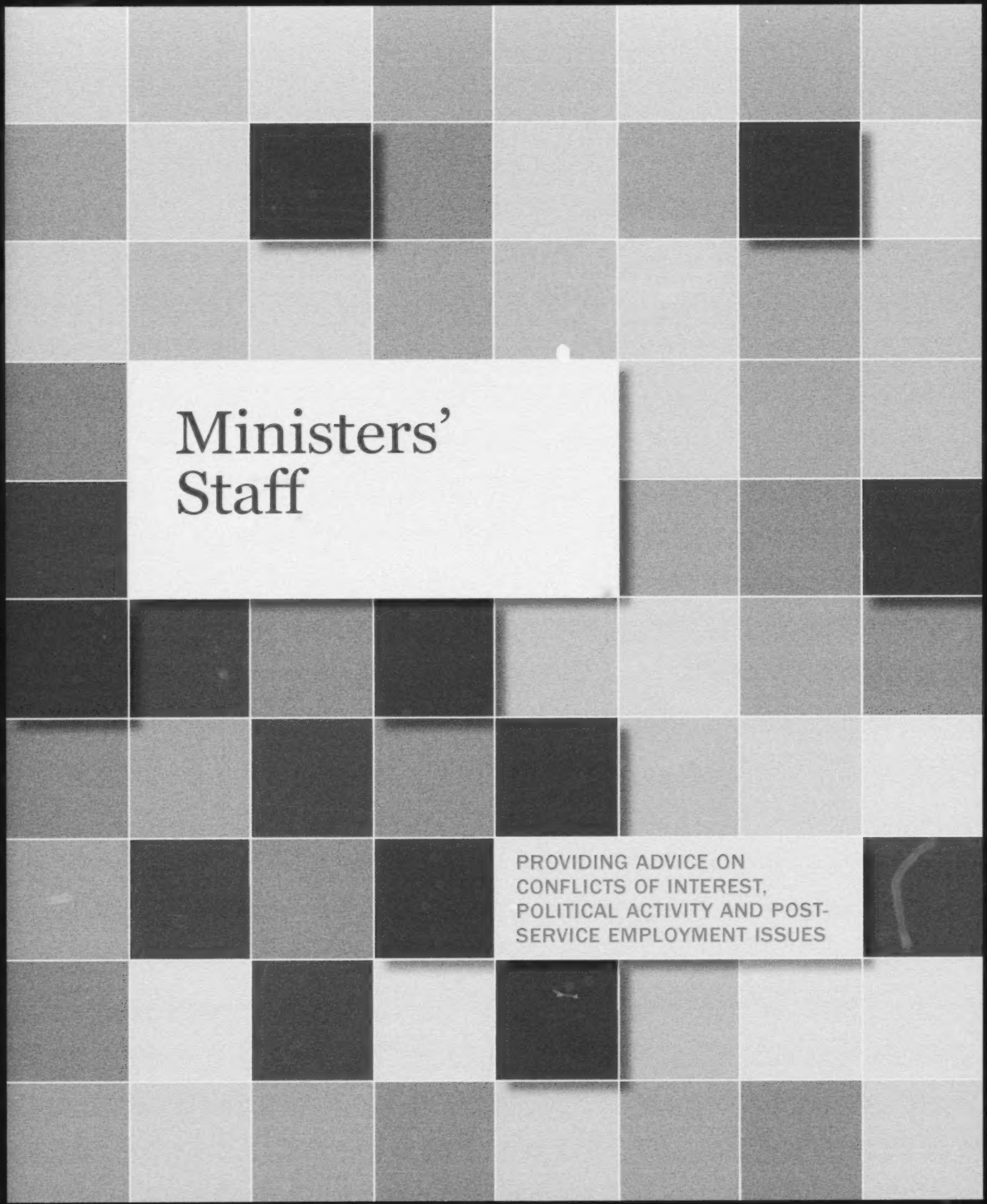
Advertising in Event Program

For many years, an MPP had placed an advertisement in the fundraising program of a local non-profit organization. The MPP had recently hired a part-time employee who is also a member of the board of the same non-profit. Was it appropriate for the member to continue to place the advertisement in the publication, given the staff member's board participation?

Opinion

The Commissioner's opinion was that the member may continue to place the advertisement in the publication given the long history of advertising with the publication. The Commissioner offered additional guidance based on the fact that the staff actions can reflect on the member. The advice was as follows:

- the staff member's non-profit board duties should be carried out only on his own time;
- constituency office resources should not be used to carry out any of the staff member's board duties;
- if any issues about the non-profit arose in the constituency office, the staff member should recuse himself from dealing with these matters; and
- the staff member should take care not to use his position with the constituency office to proffer preferential treatment to the board. Should any issues arise at the board with respect to provincial government funding, the staff member should recuse himself.



Ministers' Staff

PROVIDING ADVICE ON CONFLICTS OF INTEREST, POLITICAL ACTIVITY AND POST-SERVICE EMPLOYMENT ISSUES

Ministers' Staff

Mandate

As Ethics Executive for ministers' staff, the Integrity Commissioner makes determinations about conflict of interest, political activity and post-service employment matters.

The standards applicable to ministers' staff are found in the *Public Service of Ontario Act, 2006*, sections 66–69 and 94–98, and in the *Conflict of Interest Rules for Public Servants (Ministers' Offices) and Former Public Servants (Ministers' Offices)*.

Overview

Ministers' staff may not use their positions to benefit themselves or their family members

The Office received 139 inquiries from ministers' staff this year, of which 95 were about conflict of interest issues during employment and 44 were about post-employment as individuals left their positions in ministers' offices and accepted new employment. Many of the conflict of interest inquiries related to outside activities, financial holdings and gift acceptance. This year, there were more inquiries relating to family members' activities, most often involving employment with a government stakeholder. These situations can be complex, and factors such as the nature of the staff member and family member's work, as well as the typical ministry dealings with the stakeholder need to be considered. Ministers' staff may not use their positions to benefit themselves or their family members. To address some of these situations, the Commissioner directed that ethical screens be implemented in ministers' offices to ensure that staff are insulated from working on files involving their family members' work.

This year the Office undertook quarterly training sessions for recently hired ministers' staff, to provide them with a thorough understanding of their ethical obligations under the *Public Service of Ontario Act, 2006*, and those of their ministers under the *Members' Integrity Act, 1994*. The training is mandatory, and follows one of the recommendations included in the Commissioner's report on the role of ministers' staff at Queen's Park. Feedback from attendees has been positive, as they learn more about the rules and the resources available through the Office.

The Conflict of Interest Rules for Public Servants require that ministers' staff disclose ownership of certain assets if they routinely work on a matter that involves the private sector. The Office conducted 24 financial declaration reviews filed by ministers' staff this year, in which the Commissioner provided direction to address any potential conflicts of interest with respect to the personal investments of ministers' staff and their government work. Many staff have continued to consult the Office to confirm that purchases of particular securities do not constitute a conflict of interest. The integrity of the decision-making process is strengthened as ministers' staff are able to make recommendations to government free of competing personal interests.

Ministers' staff who may have had peripheral involvement or access to confidential information with respect to a private sector matter also filed financial declarations with the Office. This requirement was initiated by the government and resulted in the receipt and review of 32 financial declarations, in which the Commissioner provided direction to address potential conflicts of interest.

Inquiries

The following are samples of the inquiries received by the Commissioner and are intended to help ministers' staff identify conflict of interest issues. The inquiries are abbreviated, and the identities of those involved are anonymized and alternate in gender. The cases are provided in order to raise awareness.

Gifts

Ministers' staff are not permitted to accept gifts or benefits from anyone who has dealings or prospective dealings with the government, if a reasonable person could conclude that the gift or benefit could influence staff when performing their duties. However, this rule does not preclude ministers' staff from accepting a gift or benefit of nominal value that is given as an expression of courtesy or hospitality.

Accepting a Raffle Prize

An employee in a minister's office attended an event in her capacity as ministers' staff. She entered her business card in a draw and won complimentary air travel. Could she accept?

Determination

The air travel, if accepted, would be considered a gift under the conflict of interest rules. The prize was donated by an organization that has dealings with the Crown, and a reasonable person might conclude that its acceptance could influence the employee on the job. The Commissioner directed that the employee not accept the air travel.

Accepting Invitation to a Meal

Could an employee in a minister's office accept a lunch invitation from a company that is considering moving operations to Canada?

Determination

Personal benefits such as meals are considered gifts under the Conflict of Interest Rules. Given that the company could have future dealings with the government, it may reasonably be concluded that the lunch invitation was extended to influence the employee on the job and may also create an expectation of something in return. The Commissioner directed that the employee not accept a meal when meeting with company representatives.

Personal benefits such as meals are considered gifts under the Conflict of Interest Rules

Outside Activities

In many cases, ministers' staff are permitted to volunteer, sit on boards and work on a part-time basis outside of their government positions, providing these activities do not conflict with their government work or impair or influence their ability to perform their ministerial jobs.

Employment — Part-time Teaching

An employee in a minister's office wished to teach a part-time course at an Ontario post-secondary institution. Although the employee's ministry did not have jurisdiction over post-secondary institutions, the ministry has consulted with the sector about policy issues on an infrequent basis. Could the employee accept the teaching position?

Determination

The Commissioner determined that the employee could accept the teaching position under the following conditions:

- the minister is advised of the position and approves;
- out of an abundance of caution, the employee recuses himself from any ministry files, discussions or decisions specific to the post-secondary institution until the teaching position ends; and
- the employee does not use any government resources, including time, for teaching activities.

Volunteer Position with a Ministry Stakeholder

A policy advisor in a minister's office wished to accept a volunteer position as a member of an organization's steering committee for an annual event. The organization was one of many that received grant funding from the policy advisor's ministry. She was in the room when the minister finalized the funding decisions. Could she sit on the steering committee?

Determination

The Commissioner determined that the policy advisor would be in a position of conflict of interest if she sat on the committee as a result of her senior government position, the fact that the organization received funding from the ministry and that she was part of the decision-making process. The Commissioner directed that the policy advisor not accept the committee position.

Volunteer Position — Not A Ministry Stakeholder

An employee in a minister's office wished to sit on the board of directors of a not-for-profit organization that was not a stakeholder of the employee's ministry. Could he accept the volunteer position?

Determination

The Commissioner determined that the employee could accept the board position under the following conditions:

- the minister approves of the board position;
- the employee recuses himself from any board discussions regarding issues related to the provincial government that could potentially conflict with his work with the Crown; and
- he must not use any government resources, including time, for board activities.

Post-employment

Ministers' staff who leave the government's employ are required to comply with post-service obligations and restrictions, which include the following:

- an ongoing duty to not seek preferential treatment by, or privileged access to, government officials when making contact with the Crown;
- an ongoing duty to not disclose or use any confidential information obtained during the course of employment with the Crown;
- a potential restriction against accepting employment with an entity or person in which the employee (a) had substantial involvement, and (b) had access to confidential information that could harm the Crown or give the entity an advantage; and
- an ongoing restriction against advising any entity about a specific proceeding, negotiation or transaction about which the employee advised the Crown.

New Position with Federal Government

A former senior employee in a minister's office accepted a similar position in the office of a federal cabinet minister. It is anticipated that she will have dealings with provincial governments in the new role. What were her post-service obligations with respect to the Ontario government?

Determination

Although the former employee was subject to a lobbying restriction against her former ministry, communication between different levels of government is not considered a lobbying activity. However, she was advised to exercise caution when interacting with the Ontario government, particularly when contacting former colleagues with whom she worked, to ensure adherence to her obligation not to seek preferential treatment. She was also reminded about her confidentiality obligation.

Lobbying Restrictions

A former public servant was employed in two ministers' offices in the 12 months preceding his departure from the Crown. He asked for clarification regarding his lobbying restrictions.

Determination

The former employee was restricted from lobbying the ministers, the ministers' staff and any public servants in both ministries in which he worked. The restriction is in effect for 12 months following his departure from the Crown.

Miscellaneous

Avoiding a Conflict of Interest

An employee in a minister's office was working on a communications rollout for a new regulation. A member of the employee's family was recently hired by a company that would be affected by the regulation. All decisions with respect to the regulation's content had been made and the employee was not involved in this regard. However, it was intended that she be involved in stakeholder management. What steps could be taken to avoid a conflict of interest?

Determination

The Commissioner directed the employee to recuse herself from any dealings with her family member's employer as a result of her stakeholder relations work and her obligation not to give preferential treatment. She was also cautioned about her obligation not to disclose confidential information and was advised to avoid discussions about her ministry work with the family member.

Expenses Review

ENCOURAGING PRUDENCE
AND ACCOUNTABILITY

Expenses Review

Mandate

The Office of the Integrity Commissioner reviews travel, meal and hospitality expenses for two groups of public servants:

- cabinet ministers, parliamentary assistants, leaders of the Opposition and their staff; and
- senior executives, appointees and the top five employee expense claimants at agencies, boards and commissions.

The responsibilities can be found in two pieces of legislation:

- *Cabinet Ministers' and Opposition Leaders' Expenses Review and Accountability Act, 2002;* and
- *Public Sector Expenses Review Act, 2009.*

The reviews are conducted using the Rules Governing the Expenses of Cabinet Ministers, Opposition Leaders and other persons, the Ontario Travel, Meal and Hospitality Expenses Directive, and guidelines issued by the Integrity Commissioner.

The Office continues to develop strong relationships with stakeholders

Overview

The Office saw major changes to the expense review mandate this year as a result of amendments to the *Public Sector Expenses Review Act, 2009* (PSERA) and the *Cabinet Ministers' and Opposition Leaders' Expenses Review and Accountability Act, 2002*. As a result, the Office added staff and developed new policies and procedures to accommodate these changes. The Office continues to develop strong relationships with stakeholders, and is grateful for their cooperation. The emphasis on outreach has generated an increase in requests for advice, which has helped to ensure that all parties understand the rules and the underlying principle of prudent use of taxpayer funds.

The amendments to the PSERA were proclaimed on November 1, 2015, and resulted in the following changes to the mandate:

- The pool of public entities eligible for review increased from 19 to approximately 180. Entities will be reviewed on a rotational basis and those that show consistent compliance with the Directive may be eligible to "graduate" the review process and be replaced by another entity. It should be noted, however, that an entity may be recalled for review at any time.
- An entity that is chosen for review is required to provide expense claims for designated individuals for the current quarter and the preceding two quarters. The selection criteria are based on Ontario Regulation 440/09 and the Commissioner's discretion.
- The top five employee expenses will be calculated and submitted twice a year, as opposed to annually. This change could potentially capture more employees in the review, providing a larger snapshot of corporate culture within the organization.

Amendments to the *Cabinet Ministers' and Opposition Leaders' Expenses Review and Accountability Act, 2002* were proclaimed on January 1, 2016. Among the changes is a requirement that all expense claims covered by the Act must be posted online within 90 days of notification that the review has been completed. It is the government's responsibility to ensure the posted information remains accessible to the public on the applicable website for no less than two years.

New rules that govern cabinet ministers and opposition leaders and their respective staff were also introduced on January 1, 2016. The new rules incorporate a number of recommendations made by the Office and bring the rules more in line with those that govern public servants.

Cabinet Ministers' and Opposition Leaders' Expenses Review

The Office reviewed 1,323 claims for ministers, parliamentary assistants, opposition leaders and their respective staff.

The Commissioner is required to provide the Speaker of the Legislative Assembly with a written report on the review conducted under the Act. The Commissioner can name in the report any person who does not comply with an order to repay or a recommendation for other action; however, the Commissioner cannot name a third party and cannot fault anyone for relying on his advice.

The Office reviewed

5,347 expense claims

All expense claims examined were deemed to be in compliance with the rules and passed review.

Office staff have continued to be proactive in outreach and education, which has resulted in a high level of compliance.

Public Sector Expenses Review

Staff reviewed 4,024 expense claims submitted for designated senior management employees, appointees and the top five employee spenders of the province's 19 largest agencies, boards and commissions.

As with its other expense review mandate, the Office fosters a collaborative environment and is proactive with guidance and education. Feedback from stakeholders has been positive, and compliance has increased.

The number of agencies subject to review decreased from 21 to 19 during the year with the removal of Hydro One and the Ontario Power Authority. The Royal Ontario Museum was added and will be required to submit its first batch of expenses in the next fiscal year. In the coming year, more entities will be added to the review list from the pool of approximately 180 public entities now subject to the Act, as others are found to be fully compliant.

Disclosure of Wrongdoing

ENSURING A MEANINGFUL RESPONSE WHEN PUBLIC SERVANTS MAKE ALLEGATIONS OF WRONGDOING

Disclosure of Wrongdoing

Mandate

Ontario public servants who witness serious misconduct at work can take action by making a disclosure of wrongdoing. A public servant has a choice: disclose the information internally to their Ethics Executive or to the Integrity Commissioner, an independent third party. The Commissioner's authority to receive and deal with allegations of wrongdoing is set out in the *Public Service of Ontario Act, 2006* (PSOA).

Overview

This year, the Office concluded 25 matters from public servants making disclosures of wrongdoing

This year, the office concluded 25 matters from public servants making disclosures of wrongdoing; however, many involved conduct that did not fit within the definition of "wrongdoing" under the Act. In most of these cases, the conduct disclosed was related to alleged poor management in the area of human resources, such as hiring, disciplinary measures or handling complaints about harassment.

While gross mismanagement in the work of the Ontario Public Service is a potential wrongdoing under the Act, poor management in the area of human resources ordinarily is not, unless there is some allegation of conflict of interest, risk to the functionality of a program area or other similar risk. Nonetheless, Ethics Executives should be concerned about the increase in the number of such matters brought to the attention of the Office because they can be symptoms of a larger issue, furthering a disconnect between public servants and their managers, which can in turn discourage disclosures of wrongdoing.

Along with the growing number of disclosures received, the Office has also been told more frequently about reprisals against disclosers of wrongdoing. The Act prohibits any person from taking a reprisal against any public servant who makes, seeks advice about or cooperates with an investigation into a disclosure of wrongdoing. Ethics Executives and others involved in the disclosure of wrongdoing process can work to minimize the chance of reprisal by taking all steps possible to protect the identity of disclosers. The Act does not give the Commissioner any jurisdiction to deal with reprisals, if they occur. Public servants who believe they are the subject of a reprisal, and whose employment is covered by a collective agreement, may seek assistance and information from their union. Those without union representation may contact the Ontario Labour Relations Board or the Public Service Grievance Board.

This year the Office hired an investigator to assist in conducting independent investigations.

Activity

	2013-14	2014-15	2015-16
Total contacts from public servants	16	29	31
Request for information	8	18	11
Intention to file a disclosure of wrongdoing	8	11	20
	2013-14	**2014-15**	**2015-16**
Disposition of matters where a public servant sought to make a disclosure of wrongdoing (including matters carried over from the prior fiscal year)	9[1]	11	25[2]
Referred to appropriate senior official for investigation or under investigation by the IC	3	3	8
Not received as a disclosure of potential wrongdoing because the allegations could not possibly reveal a "wrongdoing" as that term is defined in the Act	1	2	10
Received as a disclosure of potential wrongdoing, but the circumstances were outside the Office's jurisdiction	0	1	2
File closed for miscellaneous reasons (e.g., it proceeded as an internal disclosure or there was insufficient information for the Office to pursue the matter)	5[3]	0	5[4]
Remaining under review at fiscal year-end	0	5	0

Case Summaries

Allegation of contravention of the conflict of interest rules (Referral)

It was alleged that a public servant contravened the conflict of interest rules in the course of making hiring decisions. The Commissioner referred the matter for investigation to the appropriate Ethics Executive, who concluded that there had been no wrongdoing. After requesting additional information, the Commissioner was not satisfied with the investigation.

However, the Commissioner determined that she would not be conducting her own investigation given the limited value of doing so in the circumstances of the case. Instead, the Commissioner made a number of recommendations, all of which were accepted and implemented. The Commissioner closed the file.

Allegation of gross mismanagement (Investigation)

It is alleged that public servants directed other public servants to engage in gross mismanagement by directing that ministry resources be used for a purpose unrelated to the business of the ministry. In accordance with the PSOA, the Commissioner referred the matter to two different officials within the government. In order to avoid multiple investigations, both officials referred the matter back to the Commissioner for investigation.

The Commissioner conducted an investigation and concluded that there was no wrongdoing because although the work in question *could* be used for multiple purposes, it was actually used in a way that related to the business of the ministry. Although no wrongdoing was found, the disclosure helped to clarify the appropriate use of ministry resources.

1 Includes eight matters received in 2013–2014, plus one matter remaining under review at year-end 2013.

2 Includes 20 matters received in 2015–2016, plus five matters remaining under review at year-end 2015.

3 In four of these matters, the Commissioner forwarded the information to an appropriate Ontario Public Service official for review.

4 In all of these matters, the disclosure proceeded as an internal disclosure to the Ontario Public Service.

Allegation of gross mismanagement (Investigation)

It was alleged that a public servant engaged in gross mismanagement by acting in a manner contrary to acceptable practices and failing to report an incident, contrary to policy. It was further alleged that the public servant counselled another public servant to engage in wrongdoing by directing another public servant to misrepresent the facts as they related to the incident.

The Commissioner was not satisfied that the internal investigation previously conducted by the ministry sufficiently addressed the last allegation and, accordingly, commenced her own investigation. Following the investigation, the Commissioner substantiated the allegations listed above and found that the public servant had engaged in wrongdoing. Subsequently, the Commissioner made several recommendations, which the ministry accepted.

Allegation of contravention of the conflict of interest rules (Referral)

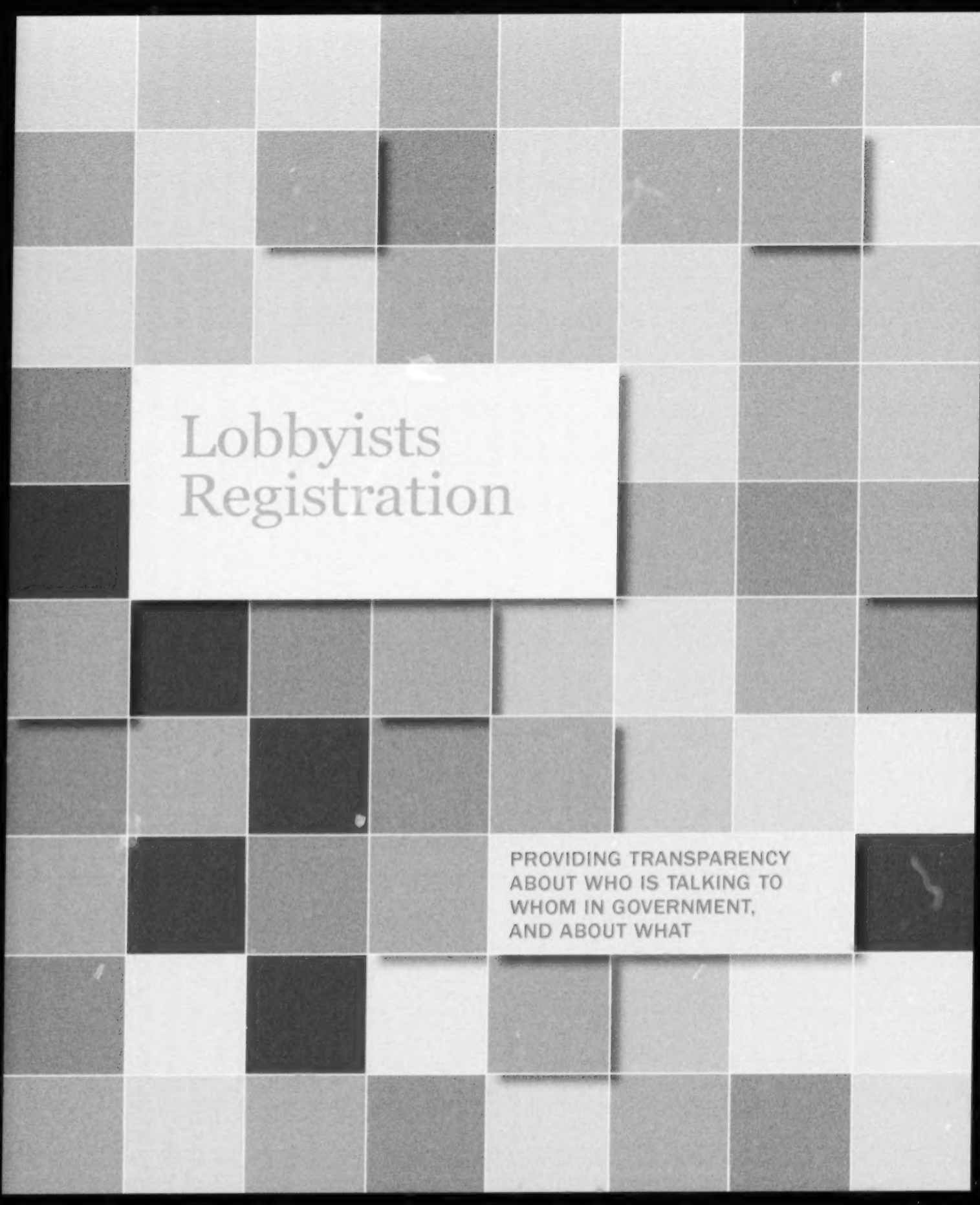
It was alleged that public servants contravened the conflict of interest rules set out in Ontario Regulation 381/07 under the PSOA by giving preferential treatment to an internal candidate during a job competition. The Commissioner referred the matter. The investigation found that the public servants did not give preferential treatment during the competition and therefore did not engage in wrongdoing as defined by the PSOA. The Commissioner was satisfied with the investigation report prepared by the ministry.

This disclosure highlighted the risk of preferential treatment being given, or to appear as though it is being given, to internal candidates during job competitions. As a result, both the ministry and the Office identified some changes that could be made to better manage these risks.

Allegation of contravention of the conflict of interest rules (Referral)

It was alleged that a public servant contravened the conflict of interest rules set out in Ontario Regulation 381/07 under the PSOA and engaged in gross mismanagement. The Commissioner referred the matter. The allegations were not substantiated by the investigation.

Although the Commissioner was not satisfied with the investigation, she determined that she would not be conducting her own investigation in order to protect the efforts currently in place to improve the workplace. Instead, the Commissioner made a number of recommendations, all of which were accepted by the ministry.


Lobbyists
Registration
PROVIDING TRANSPARENCY
ABOUT WHO IS TALKING TO
WHOM IN GOVERNMENT,
AND ABOUT WHAT

Lobbyists Registration

Mandate

The Office maintains an online public record of paid lobbyists. In Ontario, lobbying occurs when an individual or group of individuals is paid to communicate with public office holders in an attempt to influence certain government activities. A lobbyist can be someone who is paid to lobby on behalf of a client (consultant lobbyist) or an employee who spends a significant part of his or her duties lobbying on behalf of a for-profit or not-for-profit entity (in-house lobbyist). The searchable database provides each lobbyist's name, company, client or employer, the lobbying activity, the targeted ministry or agency and the communication techniques. The Integrity Commissioner is the province's Lobbyists Registrar.

This responsibility is found in the *Lobbyists Registration Act, 1998.*

Overview

Ontario's lobbyist registry is undergoing significant changes – which will greatly enhance the Registrar's responsibilities

Ontario's lobbyist registry is undergoing significant changes as a result of the *Public Sector and MPP Accountability and Transparency Act, 2014,* which amends the *Lobbyists Registration Act, 1998.* This is the first time amendments have been made to the legislation since it was passed in 1998. The amendments will greatly enhance the Registrar's responsibilities. The Office has been developing new policies and procedures to reflect the changes, as well as updating the registry with a new application process and new questions as required by the Act.

The key changes to the registration system are detailed below.

Registration Forms

A new application process will eliminate the requirement to submit a signed User Agreement, and instead will require lobbyists to certify electronically that they will abide by the rules of the system.

All lobbyists will be required to answer new questions on their registrations. They will be asked to state whether they were, at any time, a public office holder — for example, whether they were a former minister, deputy minister, associate/assistant deputy minister or member of a minister's staff, or if they were employed by certain identified agencies of the government. They will also be asked to provide more information about their lobbying targets, specifically identifying individual MPPs by riding and ministers' offices, in addition to ministries and agencies.

Consultant lobbyists will be asked to identify the date they commenced the performance of an undertaking when submitting new registrations. When terminating a registration, consultants will be asked to identify the date when they completed or terminated an undertaking.

Senior officers will be asked to identify the date each new employee or paid director became an in-house lobbyist, as well as the date each employee or paid director ceased to be an in-house lobbyist or was no longer employed by an entity.

These dates will not be included on the public registry but are important to obtain in order to assist lobbyists in ensuring compliance with the reporting timelines in the Act. They will also assist the Commissioner in identifying incidents of non-compliance.

Registration Threshold – In-house Lobbyists

At present, individuals who are paid to lobby on behalf of their employer must register if their lobbying activity, either individually or collectively, reaches 20 per cent of their time. This has been calculated at approximately 96 hours of lobbying in a three-month period.

This will change to a lower threshold which covers all paid employees and paid directors for a for-profit company and all paid employees for a not-for-profit organization, and totals their time spent lobbying. The entities will be required to register when this reaches 50 hours per year.

In-house Lobbyists (Persons and/or Partnerships)

In-house lobbyists (Persons and/or Partnerships) — for-profit entities — will see a major change to their registrations. At present, each lobbyist in this group must submit an individual registration. Going forward, the system will align with that for not-for-profit organizations: each entity will have a single registration under the name of the senior officer, and it will list the names of all employees and paid directors who lobby on that entity's behalf.

Additionally, registrations must be renewed every six months. Changes to a registration must continue to be reported within 30 days.

In-house Lobbyists (Organizations)

There are two changes specific to lobbyists in this group. Formerly, they were required to provide information about their current lobbying activity, as well as what they expect to be doing in the following six-month period. This will change so that they provide the information only for the current six-month period.

Registration renewals continue to be required every six months. However, changes to registrations that occur within the six-month period must be reported within 30 days.

Consultant Lobbyists

As a result of the changes, consultant lobbyists will be prohibited from accepting contingency fees for successful lobbying outcomes. Consultant lobbyists will also be prohibited from providing paid advice to a public office holder while lobbying any other public office holder on the same subject matter.

Registration renewals continue to be required on an annual basis. Changes to a registration must be reported within 30 days.

Investigations

The Commissioner, as Registrar, has not had investigative powers under the Act. The Office employed an informal process when a complaint was received, and the focus was always on compliance.

With the amendments, the Commissioner will be able to investigate complaints — those received from the public and also at the initiative of the Commissioner. The Office has hired an investigator and has been working on relevant policies and procedures.

In the event that the Commissioner reaches a finding of non-compliance, the Act gives the Commissioner the authority to issue administrative penalties. This can be a prohibition from lobbying in the province for up to two years, and also provides powers to name and shame, where the Commissioner can publish on the registry the name of the lobbyist, a description of the non-compliance and any other information that the Commissioner considers necessary.

To ensure compliance, it is recommended that lobbyists take stock of their activities and determine whether registration is required. If lobbyists are already registered, they must be sure that the information listed in their registration(s) is accurate and up to date. In addition to general subject matter, it is important that registrations contain specific details about lobbying goals and the intended outcome to be achieved.

Prescribed timelines must be adhered to when submitting a new registration or when renewing, amending or terminating an existing registration.

Other Changes

Other changes are more administrative in nature. For example, at present a registration cannot be renewed until its anniversary date. The change will allow all lobbyists to submit a renewal as early as 30 days before the anniversary date, and up to 30 days after.

The amendments also provide the Commissioner with the authority to create a code of conduct. Ontario does not have a code, and this will be reviewed to determine whether the province's lobbying community would benefit from its creation.

New statistics will be created in accordance with the requirements of the Act in reporting on investigative activity.

The Office is developing a comprehensive communications plan to support the registration system changes, using email blasts and social media to remind lobbyists of forthcoming changes. New resource pages were created on the website, and other tools such as video tutorials are also planned and will be released in the coming year.

Operations

The Office continued its efforts to encourage compliance with the law, and took steps to ensure that registrations provided clear and accessible information about who is lobbying whom in government. At the beginning of the year the Office implemented a new practice of returning incomplete registrations to lobbyists, along with an email outlining the deficiencies. Approximately 440 registrations were returned, which is nearly 25 per cent of the registrations submitted this year.

The majority of the registrations returned contained insufficient information about lobbying activities and goals. To assist in reducing the number of registrations being returned, lobbyists are asked to think about how they would answer the following questions:

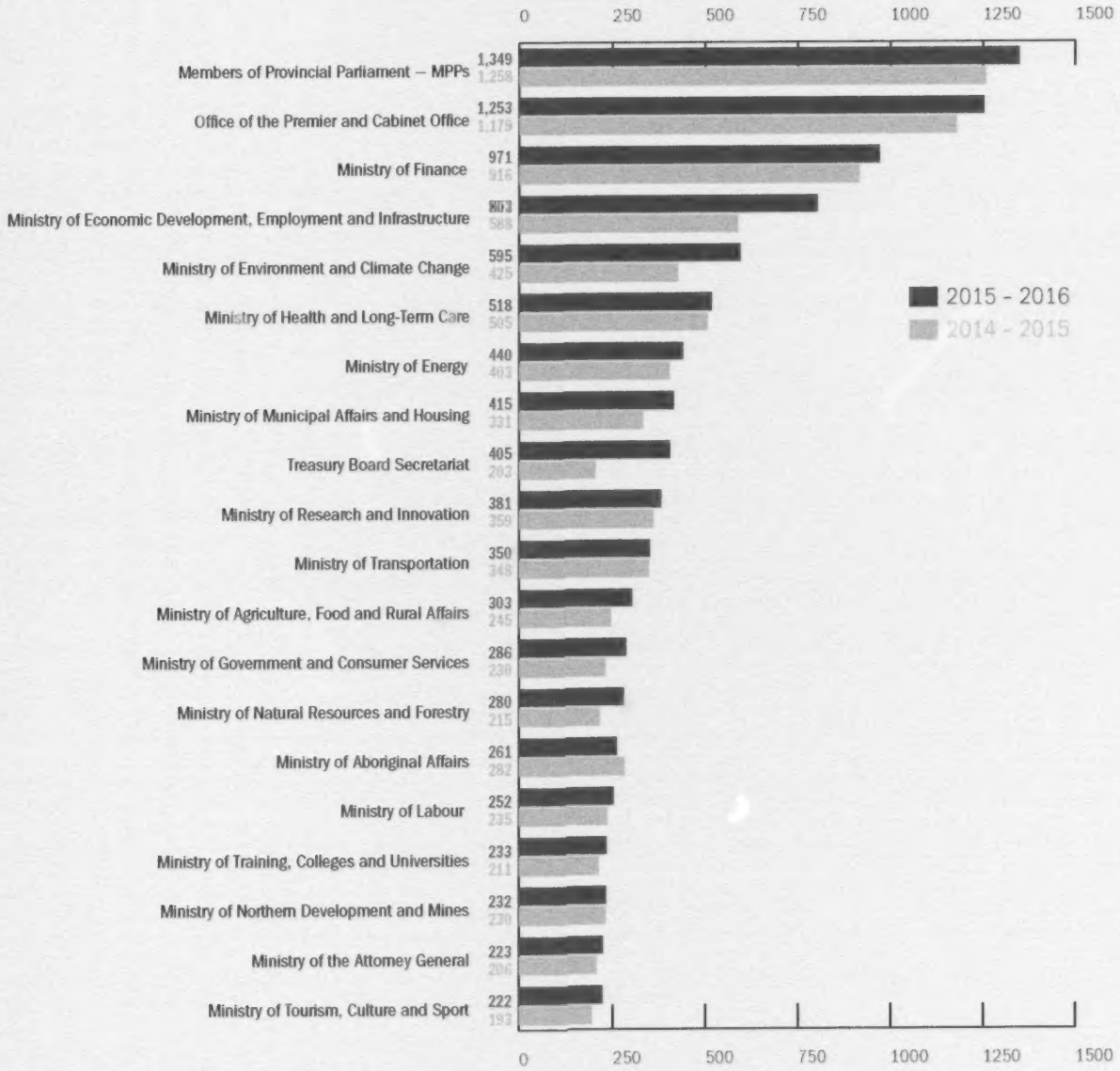
1. "I am lobbying for _____"; or
2. "My lobbying goal is _____."

Registration Activity

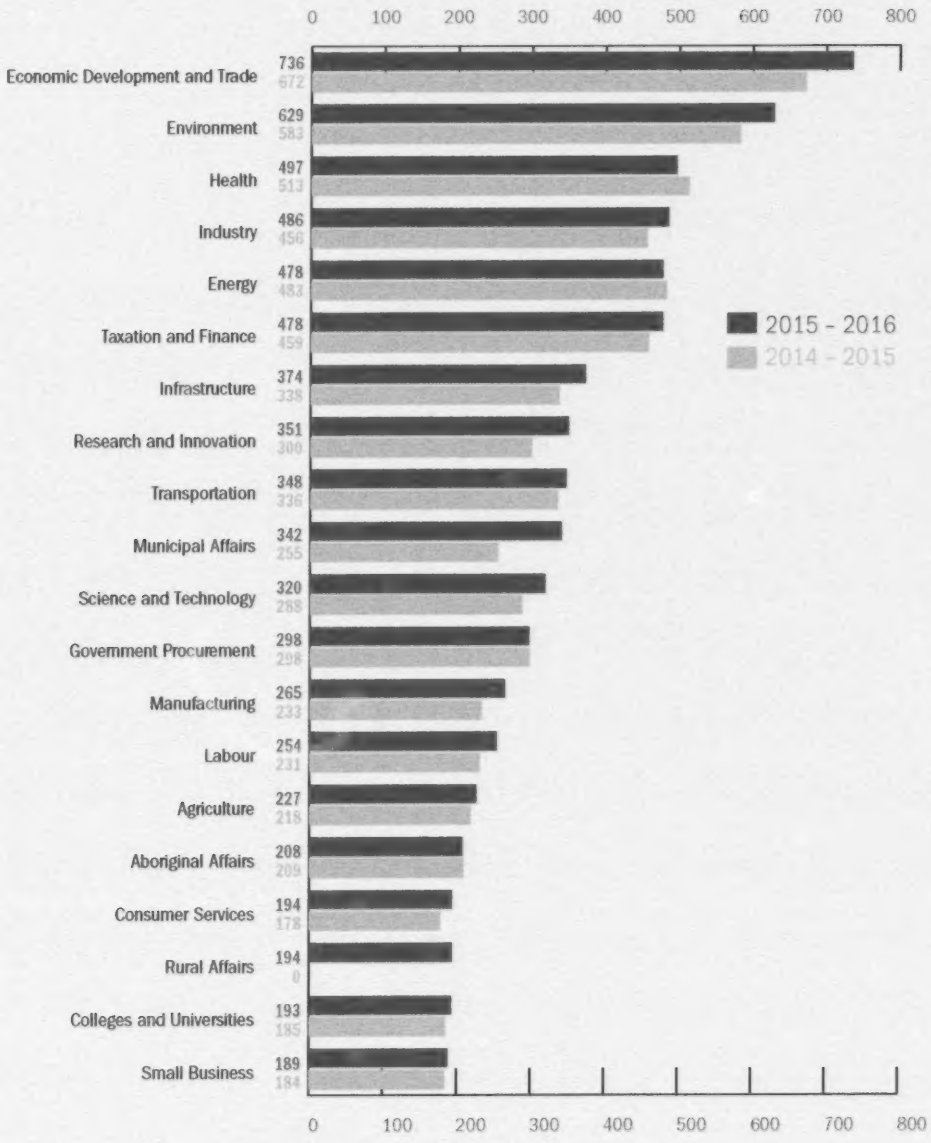
As of March 31, 2016, there were 1,816 active registrations on the registry. It is important to note that this figure will change next year as a result of the amendments affecting registrations submitted by in-house lobbyists (Persons and/or Partnerships). At present, each individual lobbyist is required to register. In the future, there will be a single registration from each entity.

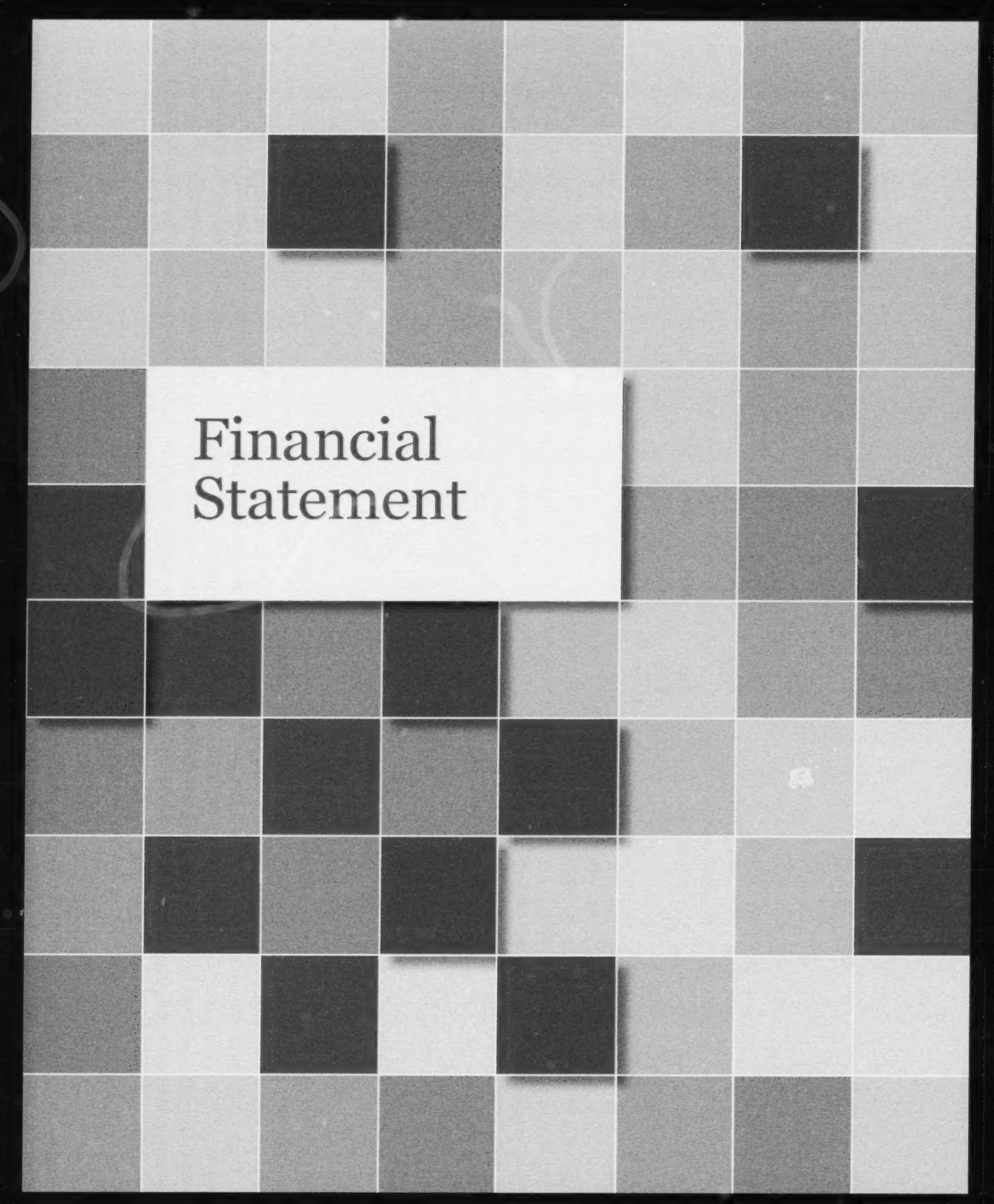
	March 31, 2015	March 31, 2016
Total Registrations	1,774	1,816
Registrations By Type		
Consultant	1,340	1,372
In-House, Organizations	232	241
In-House, Persons and/or Partnerships	202	203

Lobbyist Activity by Ministry



Lobbyist Activity by Subject Matter




Financial
Statement

Financial Statement

	2015-2016
Salaries and Benefits	$1,606,898.32
Transportation and Communication	$56,976.39
Services	$676,621.41
Supplies and Equipment	$60,309.14
Total	**$2,400,805.26**

The Office of the Integrity Commissioner's fiscal year runs from April 1 to March 31.

Financial transactions are subject to audit by the Office of the Auditor General through the accounts of the Legislative Assembly.

Information about the *Public Sector Salary Disclosure Act, 1996*, can be found at www.fin.gov.on.ca.

Proactive Disclosure

Expense claims for travel, meals and hospitality for the Office's senior management, and employees with claims exceeding $5,000, can be found at www.oico.on.ca.

Copies of this and other Ontario government publications are available at:

777 Bay Street
Toronto, ON M5G 2C8
Or
ServiceOntario
110 Laurier Avenue West
Ottawa, ON K1P 1J1
Telephone: 416.326.5300 or toll-free in Ontario, 1.800.668.9938
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The report is also available at www.oico.on.ca.
Cette publication est aussi disponible en francais.

ISSN 1205-6391 (Print) ISSN 1918-0357 (Online)

Office of the Integrity Commissioner
Suite 2100, 2 Bloor Street West
Toronto, ON M4W 3E2

Telephone: 416-314-8983
Toll-free: 1-866-884-4470
Fax: 416-314-8987
www.oico.on.ca Twitter: @ON_Integrity